

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 22-40 (JRT/LIB)**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**(1) HARSHKUMAR RAMANLAL PATEL
a/k/a “Dirty Harry,”
a/k/a Harry Patel,
a/k/a Param Singh,
a/k/a Haresh Rameshlal Patel,
a/k/a Harshkumar Singh Patel, and
(2) STEVE ANTHONY SHAND,**

Defendants.

**GOVERNMENT’S
SUPPLEMENTAL
NOTICE OF INTENT TO
OFFER EVIDENCE
UNDER FEDERAL
RULE OF EVIDENCE
902(11)**

The United States of America by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, Assistant United States Attorney Michael P. McBride and Trial Attorney Ryan Lipes, hereby gives supplemental notice of its intent to offer evidence under Federal Rules of Evidence 902(11). This notice supplements the Government’s previously filed notice in ECF 123.

Under Rule 902(11), the government hereby gives notice that its trial exhibits may include business records from the following entities, authenticated by a certification of the records custodian:

Entity	Summary of Records	Bates Number of 902(11) Certification	Bates Numbers of Underlying Records
T-Mobile US, Inc.	Subscriber and Call Detail Records for (386) 898-1637	7377	7380-7381
Turo	Turo Rental Car Records	2030	2031-2044

As noted above, the certifications and the underlying records have been provided in discovery.

Dated: October 28, 2024

Respectfully submitted,

ANDREW M. LUGER
United States Attorney

By: /s/ Ryan Lipes
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